

EXHIBIT 2

From: [James Hicks](#)
To: [Heather Derenski](#)
Cc: [Kaily Watson](#); [Karl Malling](#); [Abby Parker](#); [Erin Cossette](#); [Angela MacMillan](#); [Sean Marrin](#); [Wendy Morrow](#)
Subject: Re: Wright v. State Farm - Discovery
Date: Wednesday, October 9, 2024 10:11:47 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Hi Heather,

We're canceling tomorrow's deposition of Mr. Meeds' deposition and will work with you tomorrow on rescheduling. I suspect that, as customary, the court reporter will charge a late cancellation fee, and we will look to you to pay for that if charged. Please let me know if you do not agree.

Otherwise, I look forward to touching base with you tomorrow on the several outstanding discovery issues we have, including an update on State Farm's imminent document production.

Have a good night,
Jim

James D. Hicks
Partner
Sinars Slowikowski Tomaska LLC
2815 Elliott Avenue Suite 100
Seattle, Washington 98121
206-593-1164

From: Heather Derenski <Heather@cedarviewlaw.com>
Sent: Wednesday, October 9, 2024 9:36:39 PM
To: James Hicks <jhicks@sinarslaw.com>
Cc: Kaily Watson <Kaily@cedarviewlaw.com>; Karl Malling <karl@mallinglaw.com>; Abby Parker <Abby@cedarviewlaw.com>; Erin Cossette <erin@mallinglaw.com>; Angela MacMillan <legalassistant@mallinglaw.com>; Sean Marrin <smarrin@sinarslaw.com>; Wendy Morrow <wmorrow@sinarslaw.com>
Subject: RE: Wright v. State Farm - Discovery

Jim,

I just learned that Mr. Meeds had an unexpected issue and will not be available at 9am tomorrow. Please advise if we can reschedule. He can be available the 16th if that works for you.

We apologize for any inconvenience.

Heather

Heather Derenski | Attorney
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From: James Hicks <jhicks@sinarslaw.com>

Sent: Wednesday, October 9, 2024 9:20 PM

To: Heather Derenski <Heather@cedarviewlaw.com>

Cc: Kaily Watson <Kaily@cedarviewlaw.com>; Karl Malling <karl@mallinglaw.com>; Abby Parker <abby@cedarview-malling.com>; Erin Cossette <erin@mallinglaw.com>; Angela MacMillan <legalassistant@mallinglaw.com>; Sean Marrin <smarrin@sinarslaw.com>; Wendy Morrow <wmorrow@sinarslaw.com>

Subject: RE: Wright v. State Farm - Discovery

Heather,

I've attached our objections to your 30(b)(6) notice. Sorry for the delay. Please let me know when you're available to discuss.

See you tomorrow morning for Mr. Meeds' deposition.


Jim





James D. Hicks


Partner


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From: James Hicks

Sent: Monday, October 7, 2024 7:26 PM

To: Heather Derenski <Heather@cedarviewlaw.com>

Cc: Kaily Watson <Kaily@cedarviewlaw.com>; Karl Malling <karl@mallinglaw.com>; Abby Parker <abby@cedarview-malling.com>; Erin Cossette <erin@mallinglaw.com>; Angela MacMillan <legalassistant@mallinglaw.com>; Sean Marrin <smarrin@sinarslaw.com>; Wendy Morrow <wmorrow@sinarslaw.com>

Subject: RE: Wright v. State Farm - Discovery

Hello Heather,

Thank you for the call earlier today. I apologize for having to make it so short, and for having to abruptly end, and for any resulting miscommunication. As I explained, I was in an appointment with my eye surgeon.

We'll be serving the first of two waves of supplemental document production asap (as soon as Wednesday) as soon as we get the new PO entered. I'll send you the draft PO tomorrow so we can hopefully get it filed tomorrow or Wednesday. If all goes as planned, we should be able to deliver the 2nd wave this week or early next week.

While I acknowledge that we briefly discussed your 30(b)(6) notice months ago, I respectfully disagree that we met and conferred about each of the topics or State Farm's specific objections. I'll send you our objections in writing tomorrow. Essentially, we want to limit the deposition to the matters relevant to the claims and defenses in this case, with a focus on your client's claim. Do you have time on Wednesday, perhaps 4pm PT, to discuss?

As for the topics, we propose that we provide two witnesses:

10/15: Witness #1 - Topics 1, 2, 7, 8, 9, 13, 14

11/14: Witness #2 - All remaining topics

You could divide the 7-hour allotment as you wish. One of the benefits of this proposal to you is that you will have more time to digest the supplemental document production prior to questioning our witness about those documents. Regarding scheduling, I am set to start a 6-day trial before Judge Evanson of the Western District on 10/28.

Thank you for your consideration. We look forward to your response.


Jim




James D. Hicks


Partner


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From: Heather Derenski <Heather@cedarviewlaw.com>

Sent: Monday, October 7, 2024 11:25 AM

To: James Hicks <jhicks@sinarslaw.com>; Wendy Morrow <wmorrow@sinarslaw.com>

Cc: Kaily Watson <Kaily@cedarviewlaw.com>; Karl Malling <karl@mallinglaw.com>; Abby Parker <abby@cedarview-malling.com>; Erin Cossette <erin@mallinglaw.com>; Angela MacMillan

<legalassistant@mallinglaw.com>

Subject: Wright v. State Farm - Discovery

Jim,

Thank you for the call a few minutes ago.

I understand that you have been going through additional responsive documents from State Farm and will be producing a “pile” of documents, that you mentioned was “almost everything” due. You mentioned we’ll have that by Wednesday, and that you did find text messages and other responsive documents.

As we discussed in our previous discovery call of September 5th, these documents should be indexed or organized in a manner compliant with FRCP 34 which specifies the documents must be organized to correspond with the request. Given the considerable amounts of documents produced recently that weren’t organized, and what sounds like is forthcoming, we will bring a motion if this production does not comply with the federal rule. You indicated a second production would be coming on Friday, with the documents related to the protective order. We ask you produce the remaining responsive documents in compliance with FRCP 26 as well.

I also understand you have objections to the Amended FRCP 30(b)(6) notice sent on September 18th. We previously met and conferred on the deposition topics twice when the notice was originally served in January. The topics have not changed.

You mentioned in the call that we must meet and confer each time the deposition is re-noted. I did not find any authority that specifies a meeting is required if a deposition is rescheduled, but we are willing to meeting with you tomorrow after 1pm, given State Farm’s deposition is next week. We will need State Farm’s written objections to the FRCP 30(b)(6) topics to have a meaningful discussion.

I also understood from our call that you may have two designees for State Farm and may request the second designee appear after the discovery cutoff, by stipulation. Please advise us by tomorrow afternoon if State Farm can have both designees available for the deposition on the 15th and what topics each designee will be testifying to. We can discuss scheduling at that time.

Regarding the Stipulated Protective Order – we agreed that rather than itemizing each responsive document it makes more sense to list the category of documents to be protected. e.g. “State Farm Operation Guides and Workflows.” You agreed to have the revised stipulated protective order to us this afternoon so that it can be promptly filed and the responsive documents produced by Friday.

If I’ve missed anything from our brief conversation, it was unintentional.

We look forward to hearing from you.

Heather

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